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## Annual 47 C.F.R. 64.2009(e) CPNI Certification

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 17, 2010

Name of Company covered by this certification:

**Delhi Telephone Company**

Form 499 Filer ID: 808848

Name of signatory: Douglas N. Edwards

Title of signatory: Vice President

### CERTIFICATION

I am the Vice President for the Delhi Telephone Company. I hereby certify that I have personal knowledge that the Delhi Telephone Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. 64.2001 et seq. Accompanying this certificate is a statement explaining how the Delhi Telephone Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

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The Delhi Telephone Company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Delhi Telephone Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The Delhi Telephone Company represents and warrants that the above certification is consistent with 47.C.F.R. 1.17 which requires truthful and accurate statements to the Commission. The Delhi Telephone Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

A handwritten signature in black ink, appearing to read 'D.N. Edwards', is written over a horizontal line.

Douglas N. Edwards  
Vice President  
Delhi Telephone Company  
DTC Cable, Inc.

February 17, 2010



Attachment

**Delhi Telephone Company – FCC 499 Filer ID 808848**

## **STATEMENT OF FCC CPNI RULE COMPLIANCE**

This statement serves to explain how Delhi Telephone Company, an ILEC operating in New York, is complying with Federal Communications Commission (“FCC”) rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC’s rules is called “customer proprietary network information” (“CPNI”). The FCC’s rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC’s rules (47 C.F.R. §§ 64.2009(e)).

### **1. Identification of CPNI**

The Delhi Telephone Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC’s rules at Section 64.2003(d) of the FCC’s Part 64, Subpart U CPNI rules.

### **2. Identification of Services Affected by CPNI Rules**

The Delhi Telephone Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services offered by the Delhi Telephone Company that affects how the Company uses CPNI.

### **3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Delhi Telephone Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under the FCC’s Part 64, Subpart U, Section 64.2005.

### **4. Identification of Uses of CPNI Requiring Customer Authorization**

The Delhi Telephone Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC’s rules at Part 64, Subpart U, Section 64.2005 and/or Section 64.2008(c) as circumstances require.



## **5. Customer Notification and Authorization Process**

The Delhi Telephone Company has implemented notification and approval procedures. The Delhi Telephone Company's training and procedures have established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the utilization of the specific notice and approval requirements under the FCC's Part 64, Subpart U, Section 64.2007 (f)(2) of the CPNI rules.

## **6. Training**

The Delhi Telephone Company has trained existing employees and will train new employees having access to CPNI regarding the FCC's CPNI rules.

## **7. Record of Customer CPNI Approval/Non-Approval**

The Delhi Telephone Company has developed a system for maintaining readily accessible record of whether a customer has responded under the Opt-Out approval as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

## **8. Disciplinary Process**

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, the Delhi Telephone Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

## **9. Software Safeguards**

The Delhi Telephone Company has established procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

## **10. Supervisory Review Process for Outbound Marketing**

The Delhi Telephone Company has established a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.